

Fact Sheet



For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-04900043-2008**

Application Received: **May 19, 2008**

Plant Identification Number: **03-54-049-00043**

Permittee: **SFK Pulp Recycling U. S., Inc.**

Facility Name: **Fairmont Division**

Mailing Address: **702 AFR Drive, Fairmont, WV 26554**

Physical Location:	Fairmont, Marion County, West Virginia
UTM Coordinates:	575.30 km Easting • 4375.10 km Northing • Zone 17
Directions:	From I-79, Exit 137, follow Route 310 North. Stay in right lane to Speedway. Go straight at traffic light. Travel on Speedway (Route 73) approximately one (1) mile. Just past Novelis turn left on Suncrest Boulevard. Continue straight through a four (4)-way stop. Just past the Phillips Lighting sign, turn left down the hill. Take an immediate right and follow straight to AFR Drive.

Facility Description

The SFK Pulp Recycling U. S., Inc.'s Fairmont Division facility is a de-inked market pulp mill with a SIC and NAICS codes 2611 and 322110, respectively. Office waste paper is pulped, cleaned of contaminants, washed, and pressed. Ink and adhesives are removed; the pulp is thickened, bleached, dewatered, and dried to form a final pulp sheet. Hydrogen peroxide, sodium hydroxide, sodium silicate, formamidine sulfonic acid, sodium borodryte, and sodium biosulfate are used in the bleaching processes; chlorine is not.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2007 Actual Emissions
Carbon Monoxide (CO)	111	69.97
Nitrogen Oxides (NO _x)	81.2	29.15
Particulate Matter (PM ₁₀)	19.97	17.79
Total Particulate Matter (TSP)	19.97	17.79
Sulfur Dioxide (SO ₂)	0.21	0.11
Volatile Organic Compounds (VOC)	2.50	1.55
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2007 Actual Emissions
None		
<i>Some of the above HAPs may be counted as PM or VOCs.</i>		

Title V Program Applicability Basis

This facility has the potential to emit 100 Tons per of CO. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, SFK Pulp Recycling U.S., Inc. is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	PM from the combustion of fuel in indirect heat exchangers.
	45CSR6	Open burning prohibited.
	45CSR7	PM from manufacturing processes.
	45CSR10	Emission of sulfur dioxide.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Pre-construction permit.
	45CSR16	Standards of Performance for New Stationary Sources Pursuant to 40 C.F.R. Part 60.
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 60, Subpart Db	Industrial-Commercial-Institutional Steam Generating Units.
State Only:	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
	45CSR4	No objectionable odors.

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR15, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-1525C Class I Administrative Update. Change term "short paper fiber" to "residual materials."	February 7, 2003	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison B," which may be downloaded from DAQ's website.

Determinations and Justifications

There were no changes or additions since the issue of the December 22, 2003 Title V Permit and Fact Sheet.

The following updates were made in the renewal.

1. Added Section 1.2, Active R13, R14, and R19 Permits and Table.
2. Updated the facility information and regulatory language for Sections 3.1.1 and 3.1.2, 45CSR§§6-3.1 and 3.2.
3. Removed Consent Order CO-R13-E-2002-32 from Section 3.1.12 since it was incorporated in Permit R13-1525B. Consent Order CO-R13-E-2002-32 is also referenced in the R13-1525B Application.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

45CSR21	<i>Regulation to Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds.</i> This facility is located in Marion County and is not included in the listed counties.
45CSR27	<i>To Prevent and Control the Emissions of Toxic Air Pollutants.</i> This rule does not apply to this facility as it does not emit any of the listed toxic air pollutants.

45CSR29	<i>Rule Requiring the Submission of Emission Statements for Volatile Organic Compound Emissions and Oxides of Nitrogen Emissions.</i> This rule applies only to stationary sources located in Putnam, Kanawha, Cabell, Wayne, Wood, and Greenbrier Counties. This facility is located in Marion County; therefore, it is exempt from this rule.
40 C.F.R. Part 60 Subpart Kb	<i>Standards of Performance for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.</i> This facility does not store volatile organic liquids in storage tanks that meet the requirements of the rule. Additionally, Pulp and Paper facilities are not subject to NSPS Subpart Kb as long as the vessels are flow-through process tanks (per Applicability Determination Index, #9800099)
40 C.F.R. Part 63 Subpart S	<i>National Emissions Standards for Hazardous Air Pollutants from the Pulp and Paper Industry.</i> This facility is not a major source of HAPs; therefore, it is not subject to this rule.
40 C.F.R. Part 64 Compliance Assurance Monitoring (CAM)	The facility does not have any pollutant specific emissions units (PSEU) at this facility that satisfy all of the applicability criteria requirements of 40 CFR §64.2(a), i.e., that: 1) have pre-control regulated pollutant potential emissions (PTE) equal to or greater than the “major” threshold limits to be classified as a major source; 2) are subject to an emission limitation or standard and; 3) have a control device to achieve compliance with such emission limitation or standard. Therefore, the facility is not subject to the Compliance Assurance Monitoring (CAM) rule.

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: June 26, 2008
Ending Date: July 28, 2008

All written comments should be addressed to the following individual and office:

Wayne Green
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Wayne green
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1258 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

A typo was submitted within SFK application on the actual design capacity of the Asea Brown Boveri (ABB) Flakt Dryer. The design capacity was revised to 540 air dried metric ton per day from 540 air dried metric ton per hour.

SFK requested that the Response to Comments in the Title V Fact Sheet R30-04900043-2003 be in the current Fact Sheet.

“SFK (AFR) commented on the necessity of testing the dryer for particulates. They reasoned that the manufacturer of the dryer has stated that they have measured only one mg/cubic meter of dry gas with similar ovens, which in SFK's (AFR's) case correlates to 0.28 lb/hr of particulates, or only 7% of the permit limitation of 4 lb/hr. From a regulatory standpoint, they would be well within the limit (45CSR7) of 50 lb/hr. Therefore, we recommend and have agreed to replace definitive stack testing with language from 45CSR7 itself. Specifically, testing may be required "at such reasonable times as the Director may designate." This applicable requirement can be found in subsection 5.3.1 of the permit (page 27) [45CSR§7-4.12].”